

REMARKS

Claims 6-15 remain pending in this application and are subject to examination. In the office action mailed February 10, 2006, claims 6-15 were rejected under 35 U.S.C. §102 (e). No amendments are made by this Response.

Claim Rejections-35 U.S.C. §102

Claims 6-15 stand rejected under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,901,574 issued to LaCour et al. ("LaCour"). This rejection is hereby traversed, as follows.

Claim 6 is directed to a method for generating a lithography mask. The method includes generating integrated circuit design data, analyzing the integrated circuit design data to generate context information for features of a mask without the use of tags, and using the context information to write the mask features.

In contrast, LaCour teaches a method and apparatus for creating a mask from IC layout data in a manner that reduces the amount of data that is transmitted to a mask writing tool. This is done by identifying certain cells that are repeated and eliminating redundant representations. To ensure the entire chip is faithfully reconstructed, certain modifications are made to the cells. See LaCour, col. 3, lines 8-14.

LaCour teaches only systems and methods for reducing the amount of data transmitted to a mask writing tool. Nowhere does LaCour teach or suggest **generating context information** for features of a mask or **using the context information** to write the mask features. Furthermore, LaCour teaches away from using context information because the intent of LaCour is to **reduce** the amount of data transmitted to a mask writing tool. See LaCour, col. 2, lines 15-19, col. 2, lines 23-25, col. 3, lines 8-14, col. 5, lines 11-16, and elsewhere. As context information would **increase** the

amount of data, using context information directly contradicts the stated motivation of LaCour.

Thus, LaCour not only fails to teach or suggest using context information, LaCour also teaches away from using context information.

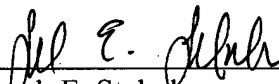
Dependent claims 7-15 are dependent on independent claim 6 and define further features of the invention. Dependent claims 7-15 are patentable for at least those reasons discussed above with reference to claim 6.

Conclusion

Based on the foregoing, all claims are now allowable and a Notice of Allowance is respectfully requested. If the Examiner has any questions or comments regarding this amendment, the Examiner is respectfully requested to contact the undersigned at (650) 849-4958. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. 50-2518, referencing billing number 7010492001.

Respectfully submitted,  
Bingham McCutchen LLP

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By:   
Sarah E. Stahnke  
Registration No. 54,854

BINGHAM McCUTCHEN LLP  
Three Embarcadero Center, Suite 1800  
San Francisco, CA 94111-4067  
Telephone: (650) 849-4960  
Telefax: (650) 849-4800